

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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BRUCE MATTHYS,

Plaintiff,

vs.

BARRICK TURQUOISE RIDGE, INC., a  
Delaware corporation

Defendant.

Case No.: 3:20-cv-00034-LRH-CLB

**ORDER GRANTING  
STIPULATION TO EXTEND  
TIME TO RESPOND TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

[FIRST REQUEST]

Pursuant to LR IA 6-1 and LR 26-3, Defendant Barrick Turquoise Ridge, Inc. ("Defendant") and Plaintiff Bruce Matthys ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to extend time for Plaintiff to Respond to Defendants' Motion for Summary Judgment (ECF No. 78) from the current deadline of January 9, 2023 through and including **January 30, 2023**. This is the first request for an extension of this specific deadline. The requested extension is sought in good faith and not for purposes of undue delay. The reasons for the extension are as follows:

1. Plaintiff's counsel was out of the country on a long-planned family commitment from December 17, 2022 through January 4, 2023.

- 1 2. Plaintiff's counsel has not had time to meet with Mr. Matthys to get his input in preparing  
2 the summary judgment response and will not be able to until after January 17, 2023 due  
3 to the other deadlines set forth below and Mr. Matthys' work schedule.
- 4 3. Plaintiff's counsel is experiencing a very heavy workload including another summary  
5 judgment opposition in another case (*McIntosh vs. City of North Las Vegas*) due on  
6 January 23, 2023; another summary judgment opposition in another case (*Lewis vs.*  
7 *Sunrise Hospital*) due on January 17, 2023; and an opening brief due in a Ninth Circuit  
8 case (*Raffele v. VCA, Inc.*) also due on January 17, 2023.
- 9 4. Additionally, Plaintiff's counsel has multiple administrative workers' compensation  
10 hearings and appeals on January 9, 10, 12, and 17.

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13 Accordingly, additional time is needed and an extension to January 30, 2023 should be  
14 sufficient.

15 IT IS SO STIPULATED.

16 Dated this 9<sup>th</sup> day of January 2023.

17 KEMP & KEMP

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19 /s/ James P. Kemp  
James P. Kemp, Esq.

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21 *Attorney for Plaintiff*

Dated this 9<sup>th</sup> day of January 2023.

SIMONS HALL JOHNSTON PC

22  
23 /s/Jonathan A. McGuire  
Anthony L. Hall, Esq.  
Jonathan A. McGuire, Esq.

24  
25 *Attorneys for Defendants*

26 **ORDER**

27 IT IS SO ORDERED.

28 DATED this 9th day of January, 2023.

  
UNITED STATES DISTRICT JUDGE